

REMARKS

Applicant requests reconsideration and further examination of this application.

Applicant has amended the issuance date into the first sentence of the application, as requested by the Examiner. Applicant has also amended Claim 15 to remove the first word “In”.

Applicant notes for the record that Claims 3 - 8 have been indicated to be allowable if rewritten in independent format including the limitations of the base claim and any intervening claims. In response, Applicant has amended the limitations of Claims 2 and 3 into independent base Claim 1 (and canceled Claims 2 and 3); Applicant has amended the limitations of Claims 1 and 2 into dependent Claim 4; and Applicant has amended Claim 5 to be dependent upon amended Claim 1. Therefore, Claims 1, 4 - 8 are now allowable.

Applicant has amended the limitations of Claims 10 and 13 into independent Claim 9, and respectfully traverses the rejection of Claim 13 (now represented by amended independent Claim 9). The Examiner rejected Claim 13 as obvious over *Niermeyer, et al.* in view of *Bassett, et al.* Applicant contends that it is not obvious to combine *Niermeyer* with *Bassett* to arrive at the claimed structure. While *Niermeyer* may disclose a plurality of tubular connection ports, it does not, as the Examiner admits, disclosed a keyed system. There is no teaching or suggestion in the cited references to combine the single port key system of the rotationally-installed *Bassett* filter with the *Niermeyer* separation module, and there is no evidence of record that it would be obvious to combine them.

Further, *Bassett* is structured entirely differently, and works entirely differently, from *Niermeyer*, and therefore it would not be obvious to take a feature of *Bassett* completely out of its context and try to install it into *Niermeyer*. *Bassett* includes a ramped key (62) on a single port that slides into a head member, and *Bassett* relies on rotating the filter (40) and the head member (26) inside a support flange 70 so that the filter and head member ride up on the ramp of the key to be retained in the support flange 70 (Figures 3, 10, and 11 of *Bassett*). On the other hand, the *Niermeyer* separation module is retained in an entirely different manner than *Bassett*, that is, by a sliding latch 34 (34a and 34b) that slides horizontally to engage notch 35 on retainer

post 36 (see Figures 3a and 3b and column 6). The *Niermeyer* separation module does not rotate relative to its holder or relative to any structure, and could not rotate because of its multiple ports.

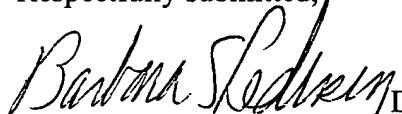
Applicant adds new Claim 19 that specifies that the protrusion consists of an elongated axial tab. Applicant adds new Claim 20 that specifies that the recess consists of an elongated axial channel. (Support at page 3, line 28; page 5, lines 19 - 26; and in Figures 12, 19, and 22 - 22, for example; no new matter is added). Even if *Bassett*'s key were lifted from *Bassett* and applied to *Niermeyer*, which Applicant contends is not an obvious thing to do, this would not result in Applicant's simple claimed axial tab and channel of Claims 19 and 20, respectively, but rather would result in a complex, ramped key that prominently features a non-axial ramp.

Therefore, Applicant believes that there is no suggestion to combine the two references cited against Claim 13 (now represented by amended Claim 9), and combining the two references would not arrive at the claimed structure. Therefore, Claims 9, 11, 12 and 14 are allowable.

Applicant supplies, through the undersigned Agent of Record, a Terminal Disclaimer addressing the double patenting rejection of Claim 15 - 18.

Applicant now believes the application and Claims 1, 4 - 9, 11, 12, 14 - 20 are allowable and respectfully requests the same.

Respectfully submitted,


Barbara S. Pedersen Date: March 16, 2005

Ken J. Pedersen, Registration No. 29,689

Barbara S. Pedersen, Registration No. 36,237

Shane A. Kennedy, Registration No. 54,760

P.O. Box 2666

Boise, ID 83701-2666

Telephone: 208-343-6355

Facsimile: 208-343-6341